Exhibit F

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	)	Master File No. 2:12-MD-02327 MDL 2327

THIS DOCUMENT RELATES TO PLAINTIFFS:

Diane Kropf
Case No. 2:12-cv-01202

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

Judy Williams
Case No. 2:13-cv-00657

Myra Byrd
Case No. 2:12-cv-00748

Angela Coleman
Case No. 2:12-cv-01267

Susan Thamen (Reeves)
Case No. 2:12-cv-00279

Donna Zoltowski
Case No. 2:12-cv-00811

DEPOSITION OF JOSEPH M. CARBONE, M.D.

GENERAL PROLIFT

Wednesday, March 16, 2016

Danville, Virginia

9:20 p.m.

Reported by: Karen K. Kidwell, RMR, CRR, CLR

GOLKOW TECHNOLOGIES, INC.
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

Q. -- were sufficient to inform doctors who perform pelvic mesh surgeries of the risk of the product?

A. Yes.

Q. Do you know what standards Ethicon applied in terms of what needed -- what warnings needed to be included in the IFU about Prolift?

A. The standards that Ethicon applied?

Q. Yes.

A. I'm not familiar with what the standards Ethicon applied, no.

Q. Now, you've stated before that it was your general practice to read the IFU of a medical device before using it the first time; is that correct?

A. My general practice.

Q. Did you assume, when you read that IFU, that the IFU was disclosing to you each of the risks and complications the company knew with the kit you were using?

MR. ROSENBLATT: Object to form.

THE WITNESS: I got, you know, do -- did I assume that the company -- repeat it again, very slowly.

BY MR. FAES:

Q. Did you assume when you read an IFU before

a medical device company to include in an IFU?

MR. ROSENBLATT: Object to form.

Misstates as far as what they require.

THE WITNESS: I mean, did they -- they have guidelines, I think, but I don't think there are any requirements. Are there requirements?

BY MR. FAES:

Q. Well, that's my question to you. Have you made any effort before your deposition today to find out what FDA regulations require a medical device company to put in an IFU?

MR. ROSENBLATT: Object to form.

THE WITNESS: Again, it's my understanding that there aren't any specific requirements. I think there are guidelines.

So have I made any effort? Am I -- have I made any effort to find out anything that doesn't exist? I mean, you know, it's a hard question to answer.

BY MR. FAES:

Q. So let me ask you another way.

A. Yes.

Q. Have you made any effort before today to find out what FDA guidelines require a medical device